

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION**

LARRY W. ASHWORTH,

Plaintiff,

v.

Civil Action No. 2:20-CV-00053

KERR MCGEE CHEMICAL CORP, et al.,

Judge James D. Cain, Jr.

Defendants.

**DECLARATION OF PERRY SANDERS IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

I, Perry R. Sanders, Jr., pursuant to 28 U.S.C. § 1746, declare:

1. I am an attorney duly licensed by the State of Louisiana. I am a partner with the Sanders Law Firm, LLC, Counsel for Plaintiff Larry W. Ashworth ("Plaintiff") and the putative class. I provide this Declaration in support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement. I have personal knowledge of the matters stated herein.
2. As of today's date, 735 people have registered as members of the putative class in this Action.
3. Attached hereto as Exhibit 1 is a true and correct copy of the Settlement Agreement and Release in the above-captioned case.
4. Attached hereto as Exhibit 2 is a true and correct copy of the Proposed Notice of Proposed Class Action Settlement.
5. Attached hereto as Exhibit 3 is a true and correct copy of the Proposed Order Preliminarily Approving the Settlement
6. Attached hereto as Exhibit 4 is a true and correct copy of the Proposed Final Order of Approval of Settlement.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Proposed Order dismissing with prejudice Occidental Petroleum Corporation and Anadarko Petroleum Corporation.

8. Attached hereto as Exhibit 6 is a true and correct copy of the letter dated October 5, 1998, drafted by the Adams and Reese Law Firm.

9. Attached hereto as Exhibit 7 is a true and correct copy of a map showing Plaintiff Ashworth's property in relation to Parcels A and B.

10. Attached hereto as Exhibit 8 is a true and correct compilation of photographs of the contamination on Plaintiff Ashworth's property.

11. Attached hereto as Exhibit 9 is a true and correct copy of a map depicting the Initial Geographical Boundaries of the Class.

12. Attached hereto as Exhibit 10 is a true and correct copy of a topographical map that presents surface water bodies and the observed surface water drainage pathways across the site, excerpted from an EPA Remedial Report.

13. Attached hereto as Exhibit 11 is a true and correct copy of a map depicting the First Amended Geographical Boundaries of the Class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 5, 2023

By: 

Perry R. Sanders, Jr.
Sanders Law Firm, LLC
31 N. Tejon, Suite 400
Colorado Springs, CO 80903
(719) 630-1556 (telephone)
(719) 630-7004 (facsimile)
perry@perrysanders.com

Counsel for Plaintiff Larry W. Ashworth